RESPONSE TO QUESTION #1

Ohio Environmental Protection Agency

John R. Kasich, Governor
Mary Taylor, Lt. Governor
Craig W. Butler, Director

June 19, 2017

Mr. Daniel McCabe
Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, Ohio 45241

RE: Environmental Enterprises Inc.
Permit - Intermediate
Acknowledgment
RCRA C – Hazardous Waste
Hamilton County
OHD083377010

Subject: Hazardous Waste Permit Modification - Class 1 Acknowledgment

Dear Mr. McCabe:

On March 13, 2017, Ohio EPA received notification for a Class 1 hazardous waste permit modification from Environmental Enterprises, Inc.(EEI) dated March 8, 2017. The modification implemented the following change to the permit:

- Updated closure cost estimate on page I-27 and replaced Attachment I-4 with an amended Standby Letter of Credit.

With this letter, Ohio EPA acknowledges the above referenced Class 1 modification submitted pursuant to Ohio Administrative Code (OAC) Rule 3745-50-51, and accordingly has updated the facility's permit application and/or permit. The updated application/permit can be retrieved from the Agency's eDocument Search web site: http://edocpub.epa.ohio.gov/publicportal/edochome.aspx. Using the search function, search under the document type of "Permit" and then refine the search using the facility's RCRA ID number (Secondary ID) which is noted in the RE: block above.

If you have any questions concerning this letter, please contact Jeff Smith of my staff at (937) 285-6070.

Sincerely,

Randy Kirkland
Manager, Southwest District Office
Division of Environmental Response and Revitalization

CERTIFICATION

"I certify under the penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system, or those persons directly responsible for gathering the information submitted is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment for knowing violations."

Daniel J. McCabe, P.E.
President

SCHEDULE A

The most recent Closure Cost Estimate is dated March 8, 2017

The Closure Plan was last adjusted in April 1, 2016

The most recent Closure Cost Estimate is $294,804.42

Facility ID#	OHD083377010
Facility Name	Environmental Enterprises, Inc.
Facility Address	4650 Spring Grove Avenue Cincinnati, OH 45232

CALCULATIONS OF THE MARCH 2017 CLOSURE PLAN UPDATE

Total Closure Cost Estimate of April 1, 2016

Last Update: February 2016 Closure Cost Estimate $291,020.93

Trust Fund Calculation for inflation as of March 8, 2017

The trust agreement needs to be funded to a value of ($291,020.93) (1.013*) = $294,804.42

A new Letter of Credit for $301,000.00 is in place as of December 21, 2016 which exceeds the amount of required funding in the Closure Trust Fund for 2017.

***Ohio EPA inflation factor for most recent period.**

TOTAL 2012 ESTIMATED COSTS FOR CLOSURE *$243,008.21*

Proposed increase in closure costs associated with proposed additional hazardous waste storage areas and storage volume increase.

The current closure cost estimate as of March 20, 2012 is $243,008.21 for closure of all Hazardous Waste activities covered under the current Hazardous Waste Permit. The modification submitted for the additional waste volume and increased areas for hazardous waste storage has included a third party estimate for transportation and disposal for the additional 24,000 gallons in storage capacity and for the decontamination of the additional areas (Area 21 thru 27) for hazardous waste storage. (Third party quotes are attached). The increased cost of closure is as follows:

Increased cost for disposal	$ 21,746.00
Increased cost for Decontamination	9,712.43
TOTAL ADDITIONAL COSTS FOR CLOSURE	$31,458.43
NEW TOTAL ESTIMATED COSTS FOR CLOSURE	$274,466.55

The current letter of credit with Huntington Bank has been amended to reflect this increased closure cost upon OEPA approval.

(2016) Revised Total Closure Cost	$291,020.93
(2017) Cost Increase Due To Inflation	$ 3,783.49
(2017) Revised Total Closure Cost	$294,804.42

I.5 FINANCIAL ASSURANCE MECHANISM FOR CLOSURE

EEI currently has in effect a Letter of Credit (LC) and a Trust Agreement with Huntington Bank for funding closure. A copy of this Trust Agreement is presented in Attachment I-4 and show the Director of OEPA as beneficiary. Also enclosed is a copy of the Certificate of Insurance issued to OEPA showing the appropriate Ohio wording. See Attachment I-5. The Ohio EPA has authorization for its hazardous waste program and it is our understanding that they have authority to administer the financial responsibility aspects of the Federal Hazardous Waste Regulations.

I.6 POST CLOSURE COST ESTIMATE

I.7 FINANCIAL ASSURANCE MECHANISM FOR POST CLOSURE PLAN

The Huntington National Bank
International Services - EA2E85
7 Easton Oval
Columbus, OH 43219
SWIFT: HUNTUS33
614-480-INTL (4685) - Customer Service
International@Huntington.com

Huntington

Amend date: 12/21/16

Standby Letter of Credit
Advice of Amendment
OSB.003336 - 16

Beneficiary:

Ohio Environmental Protection
Div of Hazardous Waste Management
122 South Front Street
Columbus, OH. 43215

Applicant:

ENVIRONMENTAL ENTERPRISES, INC.
10163 Cincinnati-Dayton Road
Cincinnati, OH 45241

We hereby amend our Irrevocable Standby Letter of Credit OSB.003336 issued in your favor for the above referenced applicant as follows:

Amount has increased by USD 13,997.11 for a new total of USD 301,000.00.

We hereby rescind our notice of non-extension under our above-referenced Letter of Credit. This Letter of Credit will automatically extend to 04/01/18.

All other terms and conditions remain unchanged.

Sincerely,

Authorized Signature

RESPONSE TO QUESTION #2

INTRODUCTION

Environmental Enterprises, Inc. (EEI) operates an ~~Interim~~ PART B PERMITTED 27,000 square feet hazardous waste treatment facility at 4650 Spring Grove Avenue, Cincinnati, Ohio. EEI also operates a contiguous property facility at 4600 Spring Grove Avenue, which until this time, only process non-hazardous wastes. EEI has constructed a PCB storage area within the facility at 4600 Spring Grove Avenue and permitted this facility as part of 4650 Spring Grove Avenue for the handling of hazardous wastes with the advent of the rules that took effect on September 29, 1990 for TC wastes.

Even though the PCB storage area is part of a RCRA permitted facility, EEI does not wish to exempt this area from TSCA storage approval requirements as permitted by 40CFR761.65 (d) (6). As such, EEI has prepared a separate closure plan for PCB's. The PCB closure plan will be funded by means of a trust fund ~~with a pa-in period of three (3) years~~.

FACILITY LOCATION

The facility is located in a heavy industrial area in north central Cincinnati, Ohio. The Mill Creek flows generally north to south approximately seventy-five feet (75') to the rear of the facility. The building does not lie in the ~~one~~ five hundred ~~(100)~~ (500) year flood plain of the Mill Creek. See Figures 1 and 2, and Attachments B and C. Also, the facility is not located along a fault or other active seismic zone. (See Figure 1, 1B and 2). The facility is secured by fencing, locked doors, CAMERAS, and natural barrier. All approaches are posted "Danger, Unauthorized Personnel Keep Out". See Figure 5 for fencing and gate locations.

The facility which contains the PCB storage area is constructed of portland cement floors, portland cement walls and painted concrete block walls. Surrounding soil consists of compacted clay and gravel. There are no sewers immediately adjacent to the property. The exterior is protected from spills by Portland cement curbs and ramps. There are no public or private drinking water wells within five (5) miles of the facility and these wells are located up gradient to the facility. Access to the facility is via four and five lane public roads, which are ALTERNATE ROUTES TO I-75 alternate routes. Access to the facility is obtained by exiting I-75 to Mitchell Avenue (exit 6); west on Mitchell Avenue to 2nd traffic light; left onto Spring Grove Avenue; approximately 0.5 mile to left into facility at traffic light at Winton Road. All access is via paved roadway. See Figure 5.

BACKGROUND AND EXPERIENCE

Environmental Enterprises, Inc. (EEI) has operated the current RCRA facility since 1980 and has an exemplary compliance history. In the past ten (10) years, EEI has no proven violations. Recent years' PCB inspections have also shown no violations of TSCA regulations other than a missing sign, which had not been replaced after painting the storage area the week prior to the inspection.

RESPONSE TO QUESTION #3

The building is a four (4) floor structure including a basement with concrete floors, and concrete block walls and concrete roof.

EEI occupies the entire building. The PCB storage area is located on the ground floor. See map B-8 in the RCRA Permit.

The loading docks are not used for the storage of PCB's. PCB containers and articles are removed from the transport vehicle and placed in the storage area. Conversely, materials being shipped off-site are taken directly from the storage area to the transport vehicle. Therefore, these loading/unloading areas are not subject to 40CFR761.65 (b).

An updated Flood Insurance Rate Map showing EEI marked as JZ0815, is attached. This information supersedes that contained in the RCRA Permit application. The building does not lie in the one hundred (100) year or five hundred (500) year flood plain of the Mill Creek.

HANDLING PROCEDURES

All PCB waste received at EEI is for storage only and must first be approved by EEI's Quality Assurance Department by submitting a PCB Waste Profile prior to shipment. EEI does not treat PCB waste. A copy of this PCB profile is included in the Waste Analysis Plan in the RCRA Permit. Materials are shipped offsite as received.

All PCB's received are tracked using bar codes. A unique bar code is assigned to each drum or piece of equipment. A computerized log is then utilized to track inventory through the facility from receipt to shipment off-site for disposal. Shipments are based on earliest date of generation first. Certificates of Disposal are forwarded to the generator upon receipt from the disposal facility.

The following containers are used at the facility:

5 gallon DOT UN1H2
55 gallon DOT UN1A1 AND UN1A2
30 gallon DOT UN1A1 AND UN1A2
4'x4'x4' Wooden Crates
4'X4'X4' Portable Tanks UN31HA
85 gallon recovery drum UN1A2 AND UN1H2
110 gallon recovery drum UN1A2 AND UN1H2
Cubic Yard Box UN11G/X/

CONTINGENCY PLAN

All spills of PCB contaminated material are to be cleaned up immediately using a combination of sorbents and kerosene followed by an alkaline degreaser wash and rinse.

Decontamination is repeated until testing confirms a level of less than 10ug/100cm^2 on sealed concrete, or the concrete may be removed and disposed of via landfill. Leaking containers are to be overpacked in fifty-five (55) gallon, eighty-five (85) gallon or one hundred and ten (110) gallon recovery drums.

The PCB storage area is to be inspected daily for leaks, proper storage, aisle space, etc. All safety equipment is inspected weekly.

In the event of a fire, the area has a sprinkler system with a central station alarm and all water is contained within the storage area and collected for analysis and disposal. Small fires may be extinguished using dry chemical extinguishers available throughout the facility. The RCRA Contingency Plan includes the TSCA storage area and is contained in Section G of the Permit Application.

CONTAINMENT CALCULATIONS

24 x 20 x 8/12 = cubic feet

Cubic feet x 7.48 = gallon container capacity (2,369 gallons)

Must be >25% of 4,684 gallons (1,171 gallons)

RESPONSE TO QUESTION #4

The building is a four (4) floor structure including a basement with concrete floors, and concrete block walls and concrete roof.

EEI occupies the entire building. The PCB storage area is located on the ground floor. See map B-8 in the RCRA Permit.

The loading docks are not used for the storage of PCB's. PCB containers and articles are removed from the transport vehicle and placed in the storage area. Conversely, materials being shipped off-site are taken directly from the storage area to the transport vehicle. Therefore, these loading/unloading areas are not subject to 40CFR761.65 (b).

An updated Flood Insurance Rate Map showing EEI marked as JZ0815, is attached. This information supersedes that contained in the RCRA Permit application. The building does not lie in the one hundred (100) year or five hundred (500) year flood plain of the Mill Creek.

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The following containers are used at the facility:

5 gallon DOT UN1H2
55 gallon DOT UN1A1 AND UN1A2
30 gallon DOT UN1A1 AND UN1A2
4'x4'x4' Wooden Crates
4'X4'X4' Portable Tanks UN31HA
85 gallon recovery drum UN1A2 AND UN1H2
110 gallon recovery drum UN1A2 AND UN1H2
Cubic Yard Box UN11G/X/

CONTINGENCY PLAN

All spills of PCB contaminated material are to be cleaned up immediately using a combination of sorbents and kerosene followed by an alkaline degreaser wash and rinse.

Decontamination is repeated until testing confirms a level of less than 10ug/100cm^2 on sealed concrete, or the concrete may be removed and disposed of via landfill. Leaking containers are to be overpacked in fifty-five (55) gallon, eighty-five (85) gallon or one hundred and ten (110) gallon recovery drums.

The PCB storage area is to be inspected daily for leaks, proper storage, aisle space, etc. All safety equipment is inspected weekly.

In the event of a fire, the area has a sprinkler system with a central station alarm and all water is contained within the storage area and collected for analysis and disposal. Small fires may be extinguished using dry chemical extinguishers available throughout the facility. The RCRA Contingency Plan includes the TSCA storage area and is contained in Section G of the Permit Application.

CONTAINMENT CALCULATIONS

24 x 20 x 8/12 = cubic feet

Cubic feet x 7.48 = gallon container capacity (2,369 gallons)

Must be >25% of 4,684 gallons (1,171 gallons)

RESPONSE TO QUESTION #6

COMMERCIAL PCB STORAGE RENEWAL APPLICATION
ENVIRONMENTAL ENTERPRISES, INC.

4650 Spring Grove Avenue
Cincinnati, OH 45232
513/541-1823
OHD 083377010

PCB STORAGE CAPACITY

The containment area has been constructed to provide containment for 25 percent of the maximum inventory of PCB containers and articles. The height of the ramps and curbs are 8".

The building is a four (4) story building with concrete floors and a concrete roof, which was replaced in 2010. The roof contains stormwater drains. It is very unlikely that precipitation would enter through the roof and penetrate three (3) concrete floors to the ground level PCB storage area. The building has concrete, brick walls and glass block on all sides. No rain is able to enter the building through the walls.

INVENTORY

The maximum inventory is 80 x 55 gallon drums and 4 x 9.5 cubic feet transformers. The maximum gallons at the time of closure could be:

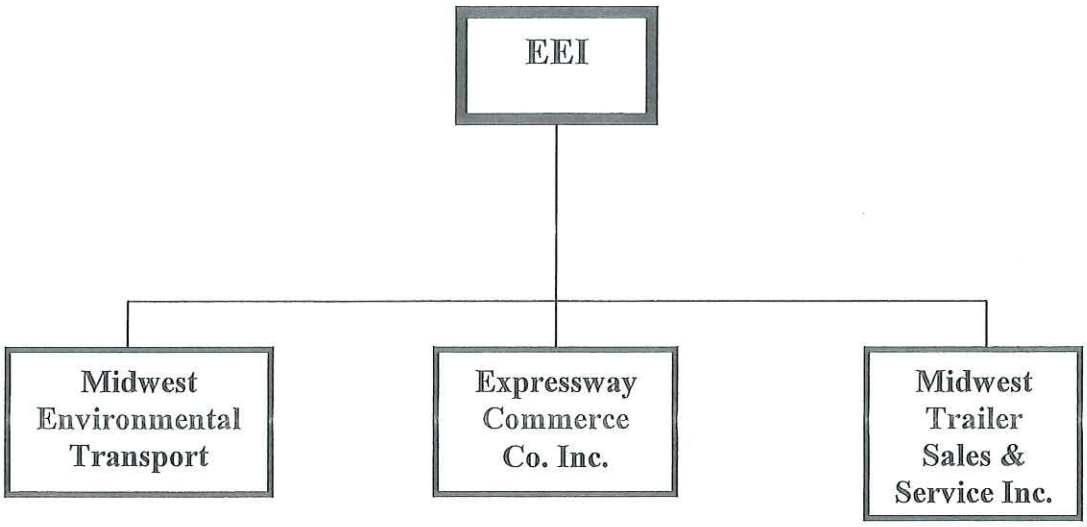
80 x 55	= 4,400 gallons
4 x 9.5 x 7.48	= 248 gallons
TOTAL	**= 4,684 gallons**

The maximum inventory is 4,684 gallons with containment of the total volume of PCB Articles or Containers being 2,369 gallons capacity, which is greater than 25% (1,171 gallons) of the total internal volume stored.

TYPES OF PCB'S FOR STORAGE

The type of PCB's EEI accepts are capacitors, ballasts, oil, contaminated soils, debris, paint, solvents, and transformers.

The types of containers EEI receives containing PCB's include; 55-gallon, 85-gallon and 110-gallon drums (UN1A1 and UN1A2), pails (1H2), and totes, which are used for storage.



PCB STORAGE

EEI has constructed a separate PCB storage area at 4600 Spring Grove Avenue, which includes eight inch (8") high curbing and a flexible urethane coated/sealed concrete floor and walls. See product literature in the RCRA Permit as Attachment D-11. There are no drains, sewer lines, expansion joints, or other floor drains, etc.

The PCB storage area is a smooth sealed concrete with spill containment curbs and ramp. The walls which form part of the storage area to the west and north are sealed with the same sealant as the floor. The curb and ramps are also coated with this sealant. Above the PCB storage area, the building raises three (3) floors; three (3) floors of concrete and a composite roof provide protection from the weather. Approximately thirty feet (30') east of the PCB storage area, a concrete block wall separates the PCB storage area from the remaining building.

The storage area measures 24' x 20' with a capacity of eighty (80) drums of oil and/or capacitors and four (4) 9.5 cubic feet transformers or their equivalent. All material is stored in drums or crates or DOT compliant containers. The facility is served by seven (7) loading docks. Only the dock at the northwest corner is used to load and unload PCB's from transport vehicles.

A minimum of eight (8) inch high solid poured concrete curb forms the PCB storage area on the east side. A ten (10) foot concrete wall forms the west and north sides and a eight (8) inch concrete ramp forms the south side of the containment area.

The wall to the north is an exterior wall of the building, while the wall which forms the west side of the PCB storage area is an interior partition. The entire PCB area is within a concrete and concrete block building.

CONTINGENCY PLAN

All spills of PCB contaminated material are to be cleaned up immediately using a combination of sorbents and kerosene followed by an alkaline degreaser wash and rinse.

Decontamination is repeated until testing confirms a level of less than 10ug/100cm^2 on sealed concrete, or the concrete may be removed and disposed of via landfill. Leaking containers are to be overpacked in fifty-five (55) gallon, eighty-five (85) gallon or one hundred and ten (110) gallon recovery drums.

The PCB storage area is to be inspected daily for leaks, proper storage, aisle space, etc. All safety equipment is inspected weekly.

In the event of a fire, the area has a sprinkler system with a central station alarm and all water is contained within the storage area and collected for analysis and disposal. Small fires may be extinguished using dry chemical extinguishers available throughout the facility. The RCRA Contingency Plan includes the TSCA storage area and is contained in Section G of the Permit Application.

CONTAINMENT CALCULATIONS

24 x 20 x 8/12 = cubic feet

Cubic feet x 7.48 = gallon container capacity (2,369 gallons)

Must be >25% of 4,684 gallons (1,171 gallons)

RESPONSE TO QUESTION #7

ENVIRONMENTAL ENTERPRISES, INC.

LABORATORY ANALYSIS REQUEST AND REPORT

A. SAMPLE INFORMATION (COMPLETE ALL BLANKS)

Sample Number **135317**

Generator Name **EEI ANNEX** Broker Name

Sample Description **MONTHLY PCB MONITORING--- MAY**

Sample Source (e.g., drum, tank **LUNCH ROOM TABLE** Sampling Device: **HEXANE SWAB**

Profile # PSS # HCT Numbers

Requested By **WARREN TAYLOR** Date **5/25/2017**

☐ Bill Customer For Analysis Work Order

Comments **TABLE SURFACE IN LUNCH ROOM**

I have obtained a representative sample of waste referenced above according to the sampling methods referenced in 40 CFR 261 Appendix I.

Samplers Nam **WARREN TAYLOR** Title: Date **5/25/2017**

B. ANALYSIS REQUESTED (CHECK ALL THAT APPLY)

Analysis	Result	By	Date	Analysis (For Main Lab)	Results (From Main Lab)		
☑ PCB	<10ug/100c	BD	5/30/2017	☐ TCLP Metals (D004-D010			
☐ BTU				☐ TCLP Volatiles			
☐ CL				☐ TCLP Semi-Volatiles			
☐ pH				☐ TCLP Herbicides/Pesticide			
☐ Flash Point				☐ TCLP F001-F005 Solvents			
☐ % Solids				☐ TCLP F006 Metals			
☐ Paint Filter				☐ MSD Metals			
☐ Cyanide (T)				☐ Phenols (MSD)			
☐ Cyanide (A)				☐ TKN (MSD)			
☐ Cyanide (R)				☐ TSS (MSD)			
☐ Cyanides (QA)				☐ BOD (MSD)			
☐ Sulfides (T)				☐ VSO (MSD)			
☐ Sulfides (R)				☐ TPH			
☐ Sulfides (QA)				☐ BTEX			
☐				☐ Oil Grease (MSD)			
☐				☐			
☐				☐			

Comments **DATA WITH UNITS: <10ug/100cm2**

☐ Sent To Main Lab Date Sent Lab Work Order

Date Analysis Completed Reviewed By

C. SAMPLE LABEL (COMPLETE LABEL BEFORE REMOVING)

Generator **EEI ANNEX** Sample # **135317**

Broker

DESCRIPTION **MONTHLY PCB MONITORING--- MAY**

Profile # PSS #

Sampled by **WARREN TAYLOR** Date **5/25/2017**

Analysis **PCB**

ENVIRONMENTAL ENTERPRISES, INC.

LABORATORY ANALYSIS REQUEST AND REPORT

A. SAMPLE INFORMATION (COMPLETE ALL BLANKS)

Sample Number **135318**

Generator Name **EEI ANNEX** Broker Name

Sample Description **MONTHLY PCB MONITORING--- MAY**

Sample Source (e.g., drum, tank **LUNCH ROOM FLOOR** Sampling Device: **HEXANE SWAB**

Profile # PSS # HCT Numbers

Requested By **WARREN TAYLOR** Date **5/25/2017**

☐ Bill Customer For Analysis Work Order

Comments **FLOOR FACE**

I have obtained a representative sample of waste referenced above according to the sampling methods referenced in 40 CFR 261 Appendix I.

Samplers Nam **WARREN TAYLOR** Title: Date **5/25/2017**

B. ANALYSIS REQUESTED (CHECK ALL THAT APPLY)

Analysis	Result	By	Date	Analysis (For Main Lab)	Results (From Main Lab)		
☑ PCB	<10ug/100c	BD	5/30/2017	☐ TCLP Metals (D004-D010			
☐ BTU				☐ TCLP Volatiles			
☐ CL				☐ TCLP Semi-Volatiles			
☐ pH				☐ TCLP Herbicides/Pesticide			
☐ Flash Point				☐ TCLP F001-F005 Solvents			
☐ % Solids				☐ TCLP F006 Metals			
☐ Paint Filter				☐ MSD Metals			
☐ Cyanide (T)				☐ Phenols (MSD)			
☐ Cyanide (A)				☐ TKN (MSD)			
☐ Cyanide (R)				☐ TSS (MSD)			
☐ Cyanides (QA)				☐ BOD (MSD)			
☐ Sulfides (T)				☐ VSO (MSD)			
☐ Sulfides (R)				☐ TPH			
☐ Sulfides (QA)				☐ BTEX			
☐				☐ Oil Grease (MSD)			
☐				☐			
☐				☐			

Comments **DATA WITH UNITS: <10ug/100cm2**

☐ Sent To Main Lab Date Sent Lab Work Order

Date Analysis Completed Reviewed By

C. SAMPLE LABEL (COMPLETE LABEL BEFORE REMOVING)

Generator **EEI ANNEX** Sample # **135318**

Broker

DESCRIPTION **MONTHLY PCB MONITORING--- MAY**

Profile # PSS #

Sampled by **WARREN TAYLOR** Date **5/25/2017**

Analysis **PCB**

ENVIRONMENTAL ENTERPRISES, INC.

LABORATORY ANALYSIS REQUEST AND REPORT

A. SAMPLE INFORMATION (COMPLETE ALL BLANKS)

Sample Number **135319**

Generator Name **EEI ANNEX** Broker Name

Sample Description **MONTHLY PCB MONITORING--- MAY**

Sample Source (e.g., drum, tank **FORK LIFT** Sampling Device: **HEXANE SWAB**

Profile # PSS # HCT Numbers

Requested By **WARREN TAYLOR** Date **5/25/2017**

☐ Bill Customer For Analysis Work Order

Comments **FORK SURFACE**

I have obtained a representative sample of waste referenced above according to the sampling methods referenced in 40 CFR 261 Appendix I.

Samplers Nam **WARREN TAYLOR** Title: Date **5/25/2017**

B. ANALYSIS REQUESTED (CHECK ALL THAT APPLY)

Analysis	Result	By	Date	Analysis (For Main Lab)	Results (From Main Lab)		
☑ PCB	<10ug/100c	BD	5/30/2017	☐ TCLP Metals (D004-D010			
☐ BTU				☐ TCLP Volatiles			
☐ CL				☐ TCLP Semi-Volatiles			
☐ pH				☐ TCLP Herbicides/Pesticide			
☐ Flash Point				☐ TCLP F001-F005 Solvents			
☐ % Solids				☐ TCLP F006 Metals			
☐ Paint Filter				☐ MSD Metals			
☐ Cyanide (T)				☐ Phenols (MSD)			
☐ Cyanide (A)				☐ TKN (MSD)			
☐ Cyanide (R)				☐ TSS (MSD)			
☐ Cyanides (QA)				☐ BOD (MSD)			
☐ Sulfides (T)				☐ VSO (MSD)			
☐ Sulfides (R)				☐ TPH			
☐ Sulfides (QA)				☐ BTEX			
☐				☐ Oil Grease (MSD)			
☐				☐			
☐				☐			

Comments **DATA WITH UNITS: <10ug/100cm2**

☐ Sent To Main Lab Date Sent Lab Work Order

Date Analysis Completed Reviewed By

C. SAMPLE LABEL (COMPLETE LABEL BEFORE REMOVING)

Generator **EEI ANNEX** Sample # **135319**

Broker

DESCRIPTION **MONTHLY PCB MONITORING--- MAY**

Profile # PSS #

Sampled by **WARREN TAYLOR** Date **5/25/2017**

Analysis **PCB**

ENVIRONMENTAL ENTERPRISES, INC.

LABORATORY ANALYSIS REQUEST AND REPORT

A. SAMPLE INFORMATION (COMPLETE ALL BLANKS)

Sample Number **135320**

Generator Name **EEI ANNEX** Broker Name

Sample Description **MONTHLY PCB MONITORING--- MAY**

Sample Source (e.g., drum, tank **FLOOR NEAR PCB AREA** Sampling Device: **HEXANE SWAB**

Profile # PSS # HCT Numbers

Requested By **WARREN TAYLOR** Date **5/25/2017**

☐ Bill Customer For Analysis Work Order

Comments **FLOOR FACE**

I have obtained a representative sample of waste referenced above according to the sampling methods referenced in 40 CFR 261 Appendix I.

Samplers Nam **WARREN TAYLOR** Title: Date **5/25/2017**

B. ANALYSIS REQUESTED (CHECK ALL THAT APPLY)

Analysis	Result	By	Date	Analysis (For Main Lab)	Results (From Main Lab)		
☑ PCB	<10ug/100c	BD	5/30/2017	☐ TCLP Metals (D004-D010			
☐ BTU				☐ TCLP Volatiles			
☐ CL				☐ TCLP Semi-Volatiles			
☐ pH				☐ TCLP Herbicides/Pesticide			
☐ Flash Point				☐ TCLP F001-F005 Solvents			
☐ % Solids				☐ TCLP F006 Metals			
☐ Paint Filter				☐ MSD Metals			
☐ Cyanide (T)				☐ Phenols (MSD)			
☐ Cyanide (A)				☐ TKN (MSD)			
☐ Cyanide (R)				☐ TSS (MSD)			
☐ Cyanides (QA)				☐ BOD (MSD)			
☐ Sulfides (T)				☐ VSO (MSD)			
☐ Sulfides (R)				☐ TPH			
☐ Sulfides (QA)				☐ BTEX			
☐				☐ Oil Grease (MSD)			
☐				☐			
☐				☐			

Comments **DATA WITH UNITS: <10ug/100cm2**

☐ Sent To Main Lab Date Sent Lab Work Order

Date Analysis Completed Reviewed By

C. SAMPLE LABEL (COMPLETE LABEL BEFORE REMOVING)

Generator **EEI ANNEX** Sample # **135320**

Broker

DESCRIPTION **MONTHLY PCB MONITORING--- MAY**

Profile # PSS #

Sampled by **WARREN TAYLOR** Date **5/25/2017**

Analysis **PCB**

ENVIRONMENTAL ENTERPRISES, INC.

LABORATORY ANALYSIS REQUEST AND REPORT

A. SAMPLE INFORMATION (COMPLETE ALL BLANKS)

Sample Number **135321**

Generator Name **EEI ANNEX** Broker Name

Sample Description **MONTHLY PCB MONITORING--- MAY**

Sample Source (e.g., drum, tank **LOCKER ROOM FLOOR** Sampling Device: **HEXANE SWAB**

Profile # PSS # HCT Numbers

Requested By **WARREN TAYLOR** Date **5/25/2017**

☐ Bill Customer For Analysis Work Order

Comments **FLOOR FACE**

I have obtained a representative sample of waste referenced above according to the sampling methods referenced in 40 CFR 261 Appendix I.

Samplers Nam **WARREN TAYLOR** Title: Date **5/25/2017**

B. ANALYSIS REQUESTED (CHECK ALL THAT APPLY)

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☑ PCB	<10ug/100c	BD	5/30/2017	☐ TCLP Metals (D004-D010			
☐ BTU				☐ TCLP Volatiles			
☐ CL				☐ TCLP Semi-Volatiles			
☐ pH				☐ TCLP Herbicides/Pesticide			
☐ Flash Point				☐ TCLP F001-F005 Solvents			
☐ % Solids				☐ TCLP F006 Metals			
☐ Paint Filter				☐ MSD Metals			
☐ Cyanide (T)				☐ Phenols (MSD)			
☐ Cyanide (A)				☐ TKN (MSD)			
☐ Cyanide (R)				☐ TSS (MSD)			
☐ Cyanides (QA)				☐ BOD (MSD)			
☐ Sulfides (T)				☐ VSO (MSD)			
☐ Sulfides (R)				☐ TPH			
☐ Sulfides (QA)				☐ BTEX			
☐				☐ Oil Grease (MSD)			
☐				☐			
☐				☐			

Comments **DATA WITH UNITS: <10ug/100cm2**

☐ Sent To Main Lab Date Sent Lab Work Order

Date Analysis Completed Reviewed By

C. SAMPLE LABEL (COMPLETE LABEL BEFORE REMOVING)

Generator **EEI ANNEX** Sample # **135321**

Broker

DESCRIPTION **MONTHLY PCB MONITORING--- MAY**

Profile # PSS #

Sampled by **WARREN TAYLOR** Date **5/25/2017**

Analysis **PCB**

ENVIRONMENTAL ENTERPRISES, INC.

LABORATORY ANALYSIS REQUEST AND REPORT

A. SAMPLE INFORMATION (COMPLETE ALL BLANKS)

Sample Number **135322**

Generator Name **EEI ANNEX** Broker Name

Sample Description **MONTHLY PCB MONITORING--- MAY**

Sample Source (e.g., drum, tank **LOCKER ROOM SINK** Sampling Device: **HEXANE SWAB**

Profile # PSS # HCT Numbers

Requested By **WARREN TAYLOR** Date **5/25/2017**

☐ Bill Customer For Analysis Work Order

Comments **SINK SURFACE**

I have obtained a representative sample of waste referenced above according to the sampling methods referenced in 40 CFR 261 Appendix I.

Samplers Nam **WARREN TAYLOR** Title: Date **5/25/2017**

B. ANALYSIS REQUESTED (CHECK ALL THAT APPLY)

Analysis	Result	By	Date	Analysis (For Main Lab)	Results (From Main Lab)		
☑ PCB	<10ug/100c	BD	5/30/2017	☐ TCLP Metals (D004-D010			
☐ BTU				☐ TCLP Volatiles			
☐ CL				☐ TCLP Semi-Volatiles			
☐ pH				☐ TCLP Herbicides/Pesticide			
☐ Flash Point				☐ TCLP F001-F005 Solvents			
☐ % Solids				☐ TCLP F006 Metals			
☐ Paint Filter				☐ MSD Metals			
☐ Cyanide (T)				☐ Phenols (MSD)			
☐ Cyanide (A)				☐ TKN (MSD)			
☐ Cyanide (R)				☐ TSS (MSD)			
☐ Cyanides (QA)				☐ BOD (MSD)			
☐ Sulfides (T)				☐ VSO (MSD)			
☐ Sulfides (R)				☐ TPH			
☐ Sulfides (QA)				☐ BTEX			
☐				☐ Oil Grease (MSD)			
☐				☐			
☐				☐			

Comments **DATA WITH UNITS: <10ug/100cm2**

☐ Sent To Main Lab Date Sent Lab Work Order

Date Analysis Completed Reviewed By

C. SAMPLE LABEL (COMPLETE LABEL BEFORE REMOVING)

Generator **EEI ANNEX** Sample # **135322**

Broker

DESCRIPTION **MONTHLY PCB MONITORING--- MAY**

Profile # PSS #

Sampled by **WARREN TAYLOR** Date **5/25/2017**

Analysis **PCB**

RESPONSE TO QUESTION #8

Hazardous Waste Facility Certificate of Liability Insurance

1. **Westchester Surplus Lines Insurance Company**, (the "Insurer"), of **11575 Great Oaks Way, Suite 200, Alpharetta, GA 30022** hereby certifies that it has issued liability insurance covering bodily injury and property damage to **Environmental Enterprises, Inc.**, of **10163 Cincinnati-Dayton Road, Cincinnati, OH 45214-1005** in connection with the insured's obligation to demonstrate financial responsibility under rules 3745-55-47 or 3745-66-47 of the Administrative Code. The coverage applies at **EPA ID#OHD083377010, 4600, 4620, 4650, Spring Grove, Cincinnati, OH 45232, which are insured for sudden and nonsudden accidental occurrences.**
The limits of liability are **$1,000,000** "each occurrence" and **$2,000,000** "annual aggregate", exclusive of legal defense costs. The coverage is provided under policy number **G27576126 003** issued on **4/1/2017**. The effective date of said policy is **4/1/2018.**

2. The Insurer further certifies the following with respect to the insurance described in Paragraph 1:

(a) Bankruptcy or insolvency of the insured shall not relieve the Insurer of its obligations under the policy.

(b) The Insurer is liable for the payment of amounts within any deductible applicable to the policy, with a right of reimbursement by the insured for any such payment made by the Insurer. This provision does not apply with respect to that amount of any deductible for which coverage is demonstrated as specified in paragraph (F) of rule 3745-55-47 or paragraph (F) of rule 3745-66-47 of the Administrative Code.

(c) Whenever requested by the director of the Ohio Environmental Protection Agency, the Insurer agrees to furnish to the director a signed duplicate original of the policy and all endorsements.

(d) Cancellation of the insurance, whether by the Insurer, the insured, a parent corporation providing insurance coverage for its subsidiary, or by a firm having an insurable interest in and obtaining liability insurance on behalf of the owner or 3745-55-51 34 operator of the hazardous waste management facility, will be effective only upon written notice and only after the expiration of sixty days after a copy of such written notice is received by the director.

(e) Any other termination of the insurance will be effective only upon written notice and only after the expiration of thirty days after a copy of such written notice is received by the director.

I hereby certify that the wording of this instrument is identical to the wording specified in paragraph (J) of 3745-55-51 of the Administrative Code as such regulation was constituted on the date first above written, and that the Insurer is licensed to transact the business of insurance, or eligible to provide insurance as an excess or surplus lines insurer, in one or more States.

Signature of authorized representative of Insurer

Date 4/6/17

Title EVP

c/o Westchester, A Chubb Company
11575 Great Oaks Way, Suite 200
Alpharetta, GA 30022

The Huntington National Bank
International Operations - EA4C57
7 Easton Oval
Columbus, OH 43219
SWIFT: HUNTUS33
614-480-INTL (4685) - Customer Service
877-480-INTL (4685) - Toll free from within US

Huntington

Irrevocable Standby Letter of Credit
OSB.003286
Issued: 04/28/05

Beneficiary:

U.S. Environmental Protection
Agency, Regional Adm., Region V
77 W. Jackson Blvd.
Chicago, IL 60604

Applicant:

Environmental Enterprises, Inc.
10163 Cincinnati-Dayton Road
Cincinnati, OH 45241

Issue Date: 04/28/2005
Amount: USD$107,000.00
Expiration Date: 04/28/2006

Dear Sir or Madam:

We hereby establish our Irrevocable Standby Letter of Credit No. OSB.003286 in your favor, at the request and for the account of Environmental Enterprises, Inc., 10163 Cincinnati-Dayton Road, Cincinnati, OH 45241, up to an aggregate amount of One Hundred Seven Thousand and Zero One Hundredths United States Dollars (USD$107,000.00) available upon presentation of:

1. Your sight draft bearing reference to this Letter of Credit No. OSB.003286, and

2. Your signed statement reading as follows: "I certify that the amount of the draft is payable pursuant to regulations issued under the authority of the Toxic Substances Control Act as amended."

This Letter of Credit is effective as of 04/28/2005 and will expire on 04/28/2006. It is a condition of this Letter of Credit that it shall be deemed automatically extended without amendment for one (1) year from the present and any future expiration date hereof, unless, at least one hundred twenty (120) days prior to the current expiration date, we notify you and Environmental Enterprises, Inc. by certified mail that we have decided not to extend this Letter of Credit beyond the current expiration date.

Whenever this Letter of Credit is drawn under and in strict compliance with the terms of this credit, we shall duly honor such draft upon presentation to us, and we will deposit the amount of the draft directly into the

COPY

The Huntington National Bank
International Operations - EA4C57
7 Easton Oval
Columbus, OH 43219
SWIFT: HUNTUS33
614-480-INTL (4685) - Customer Service
877-480-INTL (4685) - Toll free from within US

Huntington

standby trust fund of Environmental Enterprises, Inc. in accordance with your instructions.

We certify that the wording of this Letter of Credit is identical to the wording specified in 40 CFR 264.151(D) as such regulations were constituted on the date shown immediately below.

This credit is subject to the Uniform Customs and Practice for Documentary Credits (1993 Revision), International Chamber of Commerce Publication No. 500.

The Huntington National Bank

Gayla Strickler
Authorized Signature

Assistant Vice President
Title

4-28-05
Date

Printed: 04/28/05 3:54 PM ITGS563 SB_Letter_of_Credit.htm

COPY

The Huntington National Bank
International Services - EA2E85
7 Easton Oval
Columbus, OH 43219
SWIFT: HUNTUS33
614-480-INTL (4685) - Customer Service
International@Huntington.com

Huntington

Date: 04/19/17

Standby Letter of Credit
Extension Advice

Our Reference: OSB.003286

Mail to: U.S. Environmental Protection
Agency, Regional Adm. Region V
77 W. Jackson Blvd.
Chicago, IL 60604

Applicant: ENVIRONMENTAL ENTERPRISES, INC.
Amount: USD 107,000.00
Issue Date: 04/28/05

Please be advised that the above referenced Letter of Credit issued in your favor has been extended to the new expiration date of 04/28/18. If this does not agree with your records, please contact us immediately for resolution.

All terms and conditions of this Letter of Credit remain unchanged.

Sincerely,

Kayla Strickler

Authorized Signature

RESPONSE TO QUESTION #10

The public hearing on the original issuance of the Part B was not attended by anyone from the public and no public comment was received. The public hearing for the Part B Permit renewal in 2009 was attended by only four people and none of the comments received were negative or opposed the issuance of the Part B Permit. Recently, EEI processed two Class 2 Modifications adding volume and an expansion of storage areas on our RCRA Part B Permit and no one attended from the public.

The community has an active environmental group which has not lodged any complaints against EEI. EEI is a welcome member of the local business community.

ENVIRONMENTAL JUSTICE

The major Environmental Justice concern was that waste management facilities were being located close to economically disadvantaged and black communities. While this may have been true for some areas of the country, this was definitely not the case with EEI. EEI located to its present site in the late 1970's because it was the only site in Cincinnati that would store "red label" or flammable materials. The old Formica complex met the building and zoning codes for management of this type of material. The selection of this location was not based on race or economic issues. Dan McCabe made the decision to locate here based on the types of materials that needed to be stored. No other facilities were available that met the necessary criteria.

The Environmental Justice concern originally surfaced up in the 1990's. This was an issue for everyone in the 45232 zip code due to the presence of a municipal solid waste landfill (ELDA), a construction and demolition landfill (The Grey Road Landfill), and numerous manufacturing industries located in the Mill Creek Valley corridor. The area in which we are located contains the Mill Creek, the Mill Creek Expressway (I-75) and is in an industrial corridor that reaches from the Ohio River to the GE Aircraft Engine Plant in Evendale just south of I-275.

This permit renewal does not appear to have significant public health or environmental impact. Nevertheless, EEI will inform the public of this permit renewal by issuance of a public notice in the Cincinnati Enquirer and by a meeting with the Spring Grove Community Council to explain the permit process and help their understanding and knowledge of this permit renewal.

EEI proposes to develop a fact sheet that would explain what is proposed and present it during the community meeting. Community public activities include but are not limited to the Spring Grove Community picnics. EEI also submits all Permit Change Requests (PCR) to all local officials. EEI is involved with the community public activities for the Spring Grove Community. EEI attends the local community council meetings.

ENVIRONMENTAL VIOLATIONS

On December 28, 2012, EEI had an explosion and fire at the facility while processing sodium chlorate filters which reacted. The combination of sodium chlorate or cellulosic filters has explosive properties, which were not stated on the profile.

RESPONSE TO QUESTION #11